

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

IN RE:

)	CASE NO.: 20-02238-jw
)	CHAPTER 13
)	
Dawn Marie Seaver)	
)	
Debtor)	
)	
)	
vs)	
)	MOTION FOR CONTEMPT
)	
Titlemax of South Carolina Inc)	
)	
Defendant)	

Plaintiff, Sharon Dawn Seaver, would respectfully allege as follows:

1. Plaintiff filed a Chapter 13 action on May 5, 2020, listing Defendant, as an interested party and notice was duly provided this entity. The Plan proposed to value Defendant's claim for a 1998 Toyota 4Runner with VIN# JT3HN87R4W9015519. No Objection was filed.
2. Section 3.2 of the Plan reads, in part, as follows: "any secured creditor paid the allowed secured claim provided for by this plan shall release its lien at the earliest of the time required by applicable state law, order of this Court, or thirty (30) days from the entry of discharge".
3. A Proof of Claim was filed by Defendant on June 5, 2020 (claim 2-1).
4. Plaintiff's Plan was confirmed on October 7, 2020.
5. An Order of Discharge was issued on November 1, 2021.
6. Upon the closing of the case, requests for the release of lien/title to the automobile have been made by both Ms. Seaver and undersigned; no title has been forthcoming. EXHIBIT A

7. At no time since the closing of the case has Defendant(s) attempted to contact the Plaintiff or undersigned.
8. This court has jurisdiction of this matter under 28 U.S.C. §1334. This is a core proceeding under 28 U.S.C. §1409.
9. Plaintiff believes that under 11 U.S.C. §105, this court has power to issue an order for Defendant's contempt which necessitated this chain of events, causing Plaintiff emotional distress, unnecessary costs, and attorney fees.

WHEREFORE, Ms. Seaver asks this court to Order the release of lien, title and further fashion a remedy which this court believes to be fair and equitable, together with appropriate fees and costs being awarded to Plaintiff.

/s/Michael G. Matthews
Michael G. Matthews
District Court I.D. #10012
Attorney for Plaintiffs
2015 Boundary Street, Suite 319
Beaufort, SC 29902
843-379-0702 phone
843-379-0703 fax
Matthews.michaelg@gmail.com

Beaufort, South Carolina
Dated April 20, 2022

Exhibit A

MICHAEL G. MATTHEWS, ATTORNEY AT LAW
ONE BEAUFORT TOWNE CENTER
2015 BOUNDARY STREET, STE 319
BEAUFORT, SOUTH CAROLINA 29902

Michael G. Matthews, Esquire
Jenny Durham, Bankruptcy Asst.

Telephone (843) 379-0702
Facsimile (843) 379-0703

February 8, 2022

Title Max
15 Bull Street Ste 200
Savannah, GA 31401

Re: Bankruptcy Chapter 13 Dawn M. Seaver
Case No.: 20-02238
Account No.: 34763045 - 1998 Toyota 4Runner

Dear Madam/Sir:

Please be advised that our office represented Dawn Seaver in a chapter 13 bankruptcy case. The case has now been completed and the Debtor has been discharged. According to the trustee's records, your claim has been paid in full, per your proof of claim with interest. A copy of the Order of Discharge is attached. Please forward the title to the 1998 Toyota 4Runner free and clear of liens to Ms. Seaver at the following address within fourteen (14) days to prevent possible further legal action:

Dawn Seaver
212 Old Dover Road
Rochester, NH 03867

Please notify our office when this has been completed. Thanking you in advance for your prompt attention to this matter.

Sincerely,

MICHAEL G. MATTHEWS, ESQUIRE

Michael Matthews
MGM:jld

NOTICE

THIS LAW FIRM IS AN OFFICIAL DEBT RELIEF AGENCY PURSUANT TO THE UNITED STATES BANKRUPTCY CODE, 11 USC § 101(12A) PROVIDING ADVICE AND ASSISTANCE TO PERSONS FILING BANKRUPTCY UNDER THE BANKRUPTCY CODE.

United States Bankruptcy Court
District of South Carolina

Case Number: 20-02238-jw

Chapter: 13

In re:

Dawn Marie Seaver

Entered By The Court
11/1/21

ORDER DISCHARGING DEBTOR(S)

Filed By The Court
11/1/21
Laura A. Austin
Clerk of Court
US Bankruptcy Court

A discharge under 11 USC § 1328(a) is granted to: Dawn Marie Seaver

IT IS SO ORDERED.



John E. Waite
United States Bankruptcy Judge

SEE THE BACK OF THIS ORDER FOR IMPORTANT INFORMATION

Receipts:

Total paid by or on behalf of the debtor \$8,278.00
Less amount refunded to debtor \$442.00

NET RECEIPTS: **\$7,836.00**

Expenses of Administration:

Attorney's Fees Paid Through the Plan \$2,835.00
Court Costs \$0.00
Trustee Expenses & Compensation \$682.34
Other \$0.00

TOTAL EXPENSES OF ADMINISTRATION: **\$3,517.34**

Attorney fees paid and disclosed by debtor: \$1,165.00

Scheduled Creditors:

Creditor Name	Class	Claim Scheduled	Claim Asserted	Claim Allowed	Principal Paid	Int. Paid
Dish Network	Unsecured	333.93	NA	NA	0.00	0.00
INTERNAL REVENUE SERVICE	Priority	NA	1,193.00	1,193.00	1,193.00	0.00
LVNV FUNDING LLC	Unsecured	13,653.39	13,653.39	13,653.39	635.29	0.00
NorthStar Location Services	Unsecured	19,130.28	NA	NA	0.00	0.00
Palmetto State Bank	Secured	82,135.65	NA	NA	0.00	0.00
PORTFOLIO RECOVERY ASSOC LLC	Unsecured	NA	19,130.28	19,130.28	890.12	0.00
SunTrust Bank now Truist Bank	Secured	46,450.94	47,126.15	47,126.15	0.00	0.00
TITLEMAX OF SOUTH CAROLINA, INC	Unsecured	NA	2,234.71	2,234.71	103.99	0.00
TITLEMAX OF SOUTH CAROLINA, INC	Secured	2,900.00	800.00	800.00	800.00	35.87
Truist Bank	Secured	94,513.04	97,986.12	97,986.12	0.00	0.00
US BANK NATIONAL ASSOCIATION	Unsecured	15,352.08	14,007.70	14,007.70	651.77	0.00
Verizon	Unsecured	NA	185.09	185.09	8.62	0.00

1/24/2022

Dawn M. Seaver
212 Old Dover Rd
Rochester NH 03867

To Whom it may concern:

I am writing to request the title for the 1998 Toyota 4Runner that I received a loan for on Jan. 10, 2019. My account number is 34763045.

Attached is the Chapter 13 Standing Trustee's Final Report and accounting of expenses paid and disbursements of funds that verifies that Title Max received payment through the trustee as part of the discharge of my case. The final report is dated 10/27/2021. My case was closed on and filed 11/1/2021.

Please send the title to me at the address listed above as soon as possible. I no longer reside at 1700 Lafayette St. Beaufort SC 29902. Also, please email me at seaverdee@gmail.com to acknowledge receipt of this letter.

Thank you,
Dawn M. Seaver
Dawn M. Seaver

Office of the Chapter 13 Trustee

James M. Wyman, Trustee

www.charleston13.com

Payment Address:

P.O. Box 110
Memphis, TN 38101-0110

Fax: 843-388-9877

Correspondence Address:

P.O. Box 997
Mt. Pleasant, SC 29465-0997

Phone: 843-388-9844

Email: 13info@charleston13.com

September 13, 2021

DAWN MARIE SEAVER
1700 LAFAYETTE STREET
BEAUFORT, SC 29902

RE: Case: 20-02238-JW

Debtor: Dawn Marie Seaver

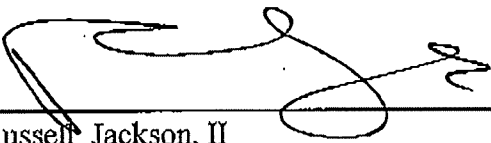
Dear Sir or Madam,

We have recently received a payment in the above referenced case. Payments are no longer required for this case due to one of the following reasons:

1. the case has completed
2. the case has been dismissed
3. the case has been converted

Thank you for your prompt attention in this matter. Should you have any questions, please contact this office.

Sincerely,



Russell Jackson, II
Chapter 13 Office

United States Bankruptcy Court
District of South Carolina

Case Number: 20-02238-jw

Chapter: 13

In re:

Dawn Marie Seaver

Entered By The Court
11/1/21

ORDER DISCHARGING TRUSTEE AND CLOSING CASE

Filed By The Court

11/1/21

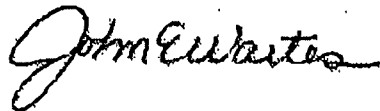
Laura A. Austin
Clerk of Court
US Bankruptcy Court

The trustee having certified that the estate of the above-named debtor(s) has been fully administered.

IT IS ORDERED THAT:

The case trustee is discharged as trustee of the estate.

The Chapter 13 case of the above named debtor(s) is closed.



John E. Waltes
United States Bankruptcy Judge

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

IN RE:

)	CASE NO.: 20-02238
)	CHAPTER 13
Dawn Seaver)	
)	CERTIFICATE OF MAILING
)	
Debtor(s))	

I, the undersigned legal assistant of the law office of Michael Matthews, Attorney at Law, attorneys for the debtor(s), do hereby certify that I have mailed a copy of the Debtor's Motion for Contempt and Exhibits in the above matter, postage prepaid to each of the parties listed below in said action, this 20th day of April, 2022

James M. Wyman Trustee
P O Box 997
Mt. Pleasant, SC 29465
Via electronic filing

Title Max of South Carolina Inc
15 Bull Street Ste 200
Savannah, GA 31401

/s/ Jenny Durham _____
Jenny Durham